Michael O. Leavitt Governor Ted Stewart Executive Director James W. Carter Division Director 355 West North Temple 3 Triad Center, Suite 350 Salt Lake City, Utah 84180-1203 801-538-5340 801-359-3940 (Fax) 801-538-5319 (TDD)

April 12, 1994

Mr. Lloyd Weir General Refractories Company 721 West 3rd Street Pueblo, Colorado 81003

Re:

Remaining Outstanding Concerns, Notice of Intention to Commence Large Mining Operations, General Refractories Company (GRC), Roudabush #1 Mine, M/045/027, Tooele County, Utah

Dear Mr. Weir:

Thank you for your response letter, received March 21, 1994, to the Division's February 21, 1991 review letter. There are remaining concerns that your letter did not address. These concerns are listed below under the applicable Minerals Rule heading. Please format your response in a similar fashion.

R613-004-105.2 Maps, Drawings and Photographs

1. All existing and/or proposed locations for the surface facilities at the mine are not shown on the maps provided in the application. Specifically, the location of topsoil stockpile(s) that currently exist along the southwestern edge of the mine site area and the coarse ore stockpile that exists on the southern side of the main access road were not shown. You mentioned you feel it is clear on the map as to borders and total property GRC will permit. Since you declined to clarify any borders, the Division will assume borders and a permit boundary for the Roudabush #1 Mine and calculate a surety accordingly. Enclosed please find a map, prepared by the Division, that contains disturbed area borders and a permit boundary we have assumed. The new bond calculation is based on this map. The Operation Plan section of this letter contains an itemized breakdown of acreage the Division planimetered from this map. The coarse ore stockpile has been sketched on this map, but the location of the topsoil stockpile is still unclear. Please revise one of the maps (Sheet 2 or 3) to include all surface facilities.



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2. Sheet 3, Mine Phasing, has portions of the map stippled and cross-hatched with different shaded patterns. No key or legend is provided on the map to enable the reviewer to interpret these patterns. Please revise this map to include a key explaining the significance of these symbols.

R613-004-106.3 Operation Plan

The following disturbed acreage was planimetered from Sheet 3, "Mine Phasing": present mine quarry area = 2.3 acres; future quarry area = 18.9 acres; stockpile area = 4.4 acres; staging area = 2.2; coarse ore stockpile area = 0.3 acres; access road = 0.9 acres (assumed average width is 30 feet). These measurements total 29.0 acres of disturbance. This figure was used in calculating the Division's reclamation surety estimate.

R613-004-107.2 &.3 Operation Practices

You have indicated a three inch (3") culvert will be used to bypass the drainage that the access road crosses. We are assuming a typographical error was made and you meant to indicate a three foot (3') culvert will be used. A three foot (3') diameter culvert should be sufficient to pass the 25 year storm event (50 cfs).

R613-004-111 Reclamation Practices

GRC has agreed to amend the seed mix to the Division's recommendation. Your letter stated that GRC will agree to the Division's alfalfa mulch recommendation of 4,000 pounds (two tons) of alfalfa mulch. The Division's recommendation is 4,000 pounds *per acre*; we assume that is what you actually meant (i.e., two tons/acre of alfalfa hay mulch).

You have indicated that the topsoil that has been stockpiled on site will be used to cover the area where crushed stone is stockpiled. Will the topsoil be used to cover the coarse ore stockpile area or the product stockpile area?

R613-004-112 Variances

There was no mention of a nutrient evaluation on the processed material in your response letter. Therefore, the Division will require a blanket application of 200 lbs/acre diammonium phosphate (18-46-0) to amend the rejected fines material prior to seeding and mulching.

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R613-004-113 Surety

The Division has calculated a revised draft of the reclamation surety estimate based upon 29.0 acres of disturbance. The total estimate is \$72,500 (1999 dollars). The estimate was based upon third party costs to reclaim the site. A copy of the draft reclamation estimate is enclosed.

The Division will seek an agreement with Tooele County regarding the conditions for final release of their \$15,000 reclamation surety. The Division will require that the reclamation surety not be released by Tooele County until the operator has satisfied all of the reclamation obligations pursuant to the Utah Mined Land Reclamation Act (Title 40-8, et. seq., as amended) and the approved mining and reclamation plan. Upon our attainment of this agreement with Tooele County, we will be able to effectively reduce the required amount of surety by \$15,000. This will lower the amount of surety required by this Division to \$57,500 (1999 dollars).

These remaining concerns will need to be addressed before the Division can grant tentative approval for this application. Please contact me or Travis Jones of the Minerals Program if you have any questions regarding the content of this letter. Thank you for your attention to this matter.

Sincerely,

D. Wayne Hedberg Permit Supervisor

Minerals Reclamation Program

jb

Enclosure (map & estimate)

cc:

Rod Thompson, Tooele County Lowell Braxton, DOGM

Minerals File

M045027.let

Reclamation Estimate General Refractories Company Roudabush Mine Tooele County

DRAFT M/045/027 filename M45-27B.WK1

last revision

04/04/94

Prepared by Utah State Division of Oil, Gas & Mining

Reclamation Plan Details

- -Bench highwall;ASSUME:20 ft wide bench every 25 ft vertical,600 LF, 3 benches tota
- -Rip all compacted areas to be revegetated
- -Distribute fines over quarry floor; fines estimated at 7% annual production, 26 yr min
- -Restore channel & riprap; ASSUME 500 LF, 6" of riprap)
- -Spread existing topsoil stockpiled (estimated vol= 300 CY)
- -Revegetation = fertilizing, mulching & seeding (previous estimate was \$468/acre)
- -Fertilizer = diammonium phosphate at 200 lbs/acre
- -Mulch = hay mulch at 2 ton/acre
- -Mobilization (third party doing reclamation)
- -Disturbed area = present quarry (2.3) + future quarry (18.9) + stockpile area (4.4) + staging area (2.2) + coarse stockpile (0.3) + access road (0.9) TOTAL SUBEACE DISTURBANCE

-101AL SURFACE DISTURBANCE =	29	ACRE		
Description	Quantit	Unit	\$/Unit	Cost(\$)
Bench highwall	41,700	CY	0.25	10,425
Remove rock pads in stockpile area	1,940	CY	1.23	2,386
Rip: pit, road, piles, pads, etc (D9N,0.8 mp	29.0	acre	304	8,816
Spread fines on quarry area	30,000	CY	0.78	23,400
Restore channel & rip rap	500	LF	1.50	750
Spread stockpiled topsoil	300	CY	0.48	144
Fertilize (\$70 materials + \$30 application)	29	acre	100	2,900
Mulch (\$150 materials + \$40 application)	29	acre	190	5,510
Seed (\$125 materials + \$50 application)	29	acre	175	5,075
Mobilization (1 dozer, 1 FE loader)	2	equip	1,000	2,000
	SUBTOTAL +10% CONTINGENCY SUBTOTAL			61,406
				6,141
				67,547
+ ESCALATION	(1.42% for 5 years)			4,934
		SUBTO	TAL	72,481
	ROUNDED TOTAL(1999-\$)			72,500
less bond amount held by TOOELE COUNTY				15,000
	ROUNDED TOTAL(1999-\$)			57,500
Average cost non-				

Average cost per acre = \$ 2,500

